

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Debra Finan	:	Case No.: 19-13496(AMC)
	:	
Debtor	:	Chapter 13

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**EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND  
CLEAR OF LIENS AND ENCUMBRANCES**

**NOW INTO COURT COMES**, Debra Finan, hereinafter referred to as “Debtor”, and brings this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code and in support thereof avers the following:

1. Debtor commenced the instant Chapter 13 matter on May 31, 2019 by filing a Voluntary Petition.
2. The Chapter 13 Plan was confirmed on February 18, 2020.
3. The subject real property is located 5123 Township Line Road, Drexel Hill, PA 19026 (hereinafter referred to as “the property”) and is owned by the Debtor.
4. Debtor believes it to be in her best financial interest to sell the property.
5. In furtherance of the sale, Debtor retained the services of Michelle Christian, a licensed realtor with REX Homes.
6. On or about March 31, 2020, Debtor, by and through her realtor entered into an Agreement of Sale of the property in the amount of \$193,800. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**
7. The settlement date for the sale of the subject property is scheduled for May 29, 2020.

8. The Buyer, Sheila Muhammad, is not an insider of the Debtor and the sale represents and arms-length transaction between the parties made without fraud and/or collusion.
9. From the sale proceeds the Debtor intends to satisfy the mortgage lien held by Wells Fargo Home Mortgage.
10. The Debtor is desirous of receiving the total exemption in the sum of \$25,150.00 from her portion of the sale proceeds plus any sums remaining after all claims are satisfied.

**WHEREFORE**, Debtor, respectfully requests that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtor to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the Debtor such other and further relief to which they may be justly entitled.

Dated: May 19, 2020

/s/Brad J. Sadek, Esq

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